

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Plaintiffs,

-against-

FELIX SATER, DANIEL RIDLOFF, BAYROCK
GROUP INC., GLOBAL HABITAT SOLUTIONS,
INC., RRMI-DR LLC, FERRARI HOLDINGS
LLC, and MEM ENERGY PARTNERS LLC,

Defendants.

19 Civ. 2645 (AJN) (KHP)

**OBJECTIONS TO
SUBPOENA TO**

MOSES & SINGER LLP (MOSES & SINGER) hereby objects to that certain Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action, dated March 10, 2020 (the “Subpoena”).

**GENERAL OBJECTIONS AND COMMENTS
APPLICABLE TO ALL REQUESTS FOR PRODUCTION IN THE SUBPOENA**

A. MOSES & SINGER objects to the Definitions and Instructions set forth in the Subpoena to the extent that such definitions or instructions may call for the production of documents or information which are protected by the attorney-client or other applicable privileges, and are violative of the Federal Rules of Civil Procedure and the Rules of the United States District Court for Southern District of New York.

B. If any documents are produced, they will be produced in response to the Subpoena as they are kept in the usual course of MOSES & SINGER’s business or as responsive to particular requests.

C. MOSES & SINGER objects to all of the requests in the Subpoena to the extent that they are overbroad, unduly burdensome, vague, vexatious and harassing.

D. MOSES & SINGER objects to the time period to which the requests relate, namely 2012 to the present, as being overbroad, burdensome and calling for information neither relevant nor material to the issues in this action and otherwise calling for privilege information.

E. MOSES & SINGER objects to the Subpoena as unduly burdensome and harassing in light of the current pandemic and the fact that resources are extremely limited during the current pandemic, including the complete lack of access to MOSES & SINGER'S offices.

Dated: New York, New York
May 11, 2020

MOSES & SINGER, LLP

S/

By: Robert Wolf